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0000000UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V

DATE:

SUBJECT: ON-SCENE COORDINATOR'S REPORT - Removal Action at  
Morris Paint and Varnish Site, East St. Louis,  
Illinois (Site ID# HP)

FROM: Robert J. Bowden, Chief *[Signature]*  
*for* Emergency and Enforcement Response Branch, 5HS-12

TO: Stephan D. Luftig, Director  
Emergency Response Division, OS-210

THRU: Norman R. Niedergang, Associate *[Signature]* Division Director  
Office Of Superfund, 5HS-11

Attached please find the On-Scene Coordinator's Report for the removal action conducted at the Morris Paint and Varnish (Morris Paint) site in East St. Louis, Illinois. The report follows the format outlined in the National Contingency Plan (NCP), Section 300.165. This removal was initiated on March 16, 1990 and was completed on June 6, 1990.

The site posed an immediate threat to human health and the environment. The action was taken to mitigate threats posed by actual or potential exposure to hazardous substances in drums, barrels, and tanks, that posed a threat of release, and a threat of fire and explosion.

Costs under the control of the On-Scene Coordinator totaled \$453,406 of which \$386,533 were for the Emergency Response Cleanup Services (ERCS) contractor.

Any indication in this OSC Report of specific costs incurred at the site is only an approximation, subject to audit and final definitization by the U.S. EPA. The OSC Report is not a final reconciliation of the costs associated with a particular site.

Portions of the OSC Report appendices may contain confidential business or enforcement-sensitive information and must be reviewed by the Office of Regional Counsel prior to release.

This site is not on the National Priorities List. The OSC for this removal action is Charles Gebien.

**ON-SCENE COORDINATOR'S REPORT  
CERCLA REMOVAL ACTION**

**MORRIS PAINT AND VARNISH COMPANY  
EAST ST. LOUIS, ILLINOIS  
SITE ID# HD**

**DELIVERY ORDER NO. 7460-05-137  
REMOVAL DATES: MARCH 16, 1990 TO JUNE 6, 1990**

**EMERGENCY AND ENFORCEMENT RESPONSE BRANCH  
OFFICE OF SUPERFUND  
WASTE MANAGEMENT DIVISION  
REGION V  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
230 SOUTH DEARBORN STREET  
CHICAGO, ILLINOIS**

## EXECUTIVE SUMMARY

Morris Paint Site/East St. Louis, Illinois  
March 16, 1990 - June 6, 1990

### INCIDENT DESCRIPTION:

The Morris Paint and Varnish Company (Morris Paint) site is a defunct paint manufacturing facility located at 1445 Brady Street, East St. Louis, Illinois (Figure 1). The U.S. EPA initiated a removal action at the Morris Paint Site at the request of the State of Illinois Environmental Protection Agency (IEPA), after a series of fires occurred in the site's manufacturing and warehouse buildings.

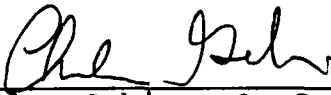
The removal action was taken to mitigate the threats to public health posed by the presence of tanks, drums and cans of flammable liquids. Along with a potential release of hazardous materials through fire or explosion, the hazardous materials posed threats through inhalation, ingestion, and dermal contact.

### ACTIONS TAKEN:

The U.S. EPA commenced a removal action at the Morris Paint site on March 16, 1990. The following removal activities were performed: repaired fencing around the site, dismantled the fire damaged warehouse building, removed nine underground solvent storage tanks, removed fire debris and spilled paint from the soil surface throughout the site, and managed paint/solvent liquids, paint solids, wastewater, fire debris/soil, emptied tanks, drums, cans, and steel scrap, as described below.

Under U.S. EPA guidance the following materials were transported off-site and managed as follows; approximately 8,500 gallons of flammable liquids were blended as fuels, 1,300 gallons of wastewater were treated at a local sewage treatment plant, 240 cubic yards of hazardous waste solids were land disposed at a RCRA landfill, and 240 cubic yards of crushed drums were land disposed at a special waste landfill. Also included in the off-site disposal were approximately 510 cubic yards of non-hazardous debris that were land disposed at a local sanitary landfill. All actions taken were consistent with the National Contingency Plan.

The removal was completed on June 6, 1990, at an estimated cost of \$468,857 under control of the On-Scene Coordinator (OSC), of which \$386,533 was for the Emergency Response Cleanup Services (ERCS) sub-contractor. The OSC's were Charles Gebien and Ken Theisen.

  
\_\_\_\_\_  
Charles Gebien, On-Scene Coordinator  
Emergency and Enforcement Response Branch

10-28-91  
Date

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Emergency And Enforcement Response Branch  
Office of Superfund, US EPA, Region 5

OSC REPORT STANDARD APPENDICES LIST \*  
Morris Paint and Varnish Co. (Site ID# HD)

APPENDIX A - Action Memorandum  
APPENDIX B - Delivery Order  
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APPENDIX N - Waste Profile Sheets  
APPENDIX O - Manifests  
APPENDIX P - Site Safety Plan  
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APPENDIX S - Drum Logs  
APPENDIX T - Site Log  
APPENDIX U - Invoices  
APPENDIX V - Air Monitoring Log

\* Portions of these OSC Report Appendices may contain confidential business information or enforcement-sensitive information and must be reviewed by the Office of Regional Counsel prior to release to the public.

\* Note that certain files for this site are maintained elsewhere in EERB; these appendices are those files maintained by the OSC during the removal action.

**LIST OF ATTACHMENTS**

ATTACHMENT A - ACTIVITY LOG  
ATTACHMENT B - PHOTOGRAPHS



## 1.0 SUMMARY OF EVENTS

### 1.1 Initial Situation

The Morris Paint and Varnish Company (Morris Paint) is a defunct paint manufacturing facility located at 1445 Brady Street, East St. Louis, Illinois (Figure 1). The site is situated in an industrial/residential area with industrial property bordering the site to the southwest and northwest, and residential property bordering the site to the northeast. A school is located approximately one quarter of a mile west of the property. Fifteenth Street is located along the southeast border of the site.

Site topography is flat and the nearest waterway is the Mississippi River, located approximately two miles west of the site. The fertile alluvial soils in the area are derived from thick glacial drifts consisting primarily of finely textured clays intermingled with fine sandy loams. The soil is underlain by Mississippian and Pennsylvanian rocks consisting of limestone and dolomite with subordinate amounts of sandstone and shale. Residents in the East St. Louis area are serviced by municipal water.

The East St. Louis Fire Department reported the site to the Illinois Environmental Protection Agency (IEPA) after a fire partially destroyed a building containing paint products on March 9, 1990. IEPA notified the U.S. Environmental Protection Agency (U.S. EPA).

### 1.2 Previous Actions

The Morris Paint site is owned by Samuel Ferguson. Mr. Ferguson has owned the site since 1979, when he purchased the property and all related materials from a bankruptcy court. A large fire destroyed much of the facility in 1982. During IEPA site inspections in November 1987 and January 1988, over 1,800 drums containing resins and solvents, many of which were in poor condition, were observed. Many of these drums were exposed to the weather. IEPA records indicated that some of the drums had been damaged by delivery trucks, and some drums showed evidence of rust damage. According to Mr. Ferguson, the drums were present on site when he purchased the property. Many open drums, areas of spillage, and areas of waste residue were observed in the dock area (Figure 2). An open tank containing burning paint cans, buckets, and refuse was also observed.

During January 1988, IEPA collected samples from the dock area, soil surface, waste residue pile, and drums to determine the presence or absence of hazardous waste at the site. Analytical results indicated the presence of flashpoints below 140 degrees Fahrenheit (°F), and the presence of toluene, ethylbenzene, and xylene in some of the samples. On April 25, 1988, IEPA began a

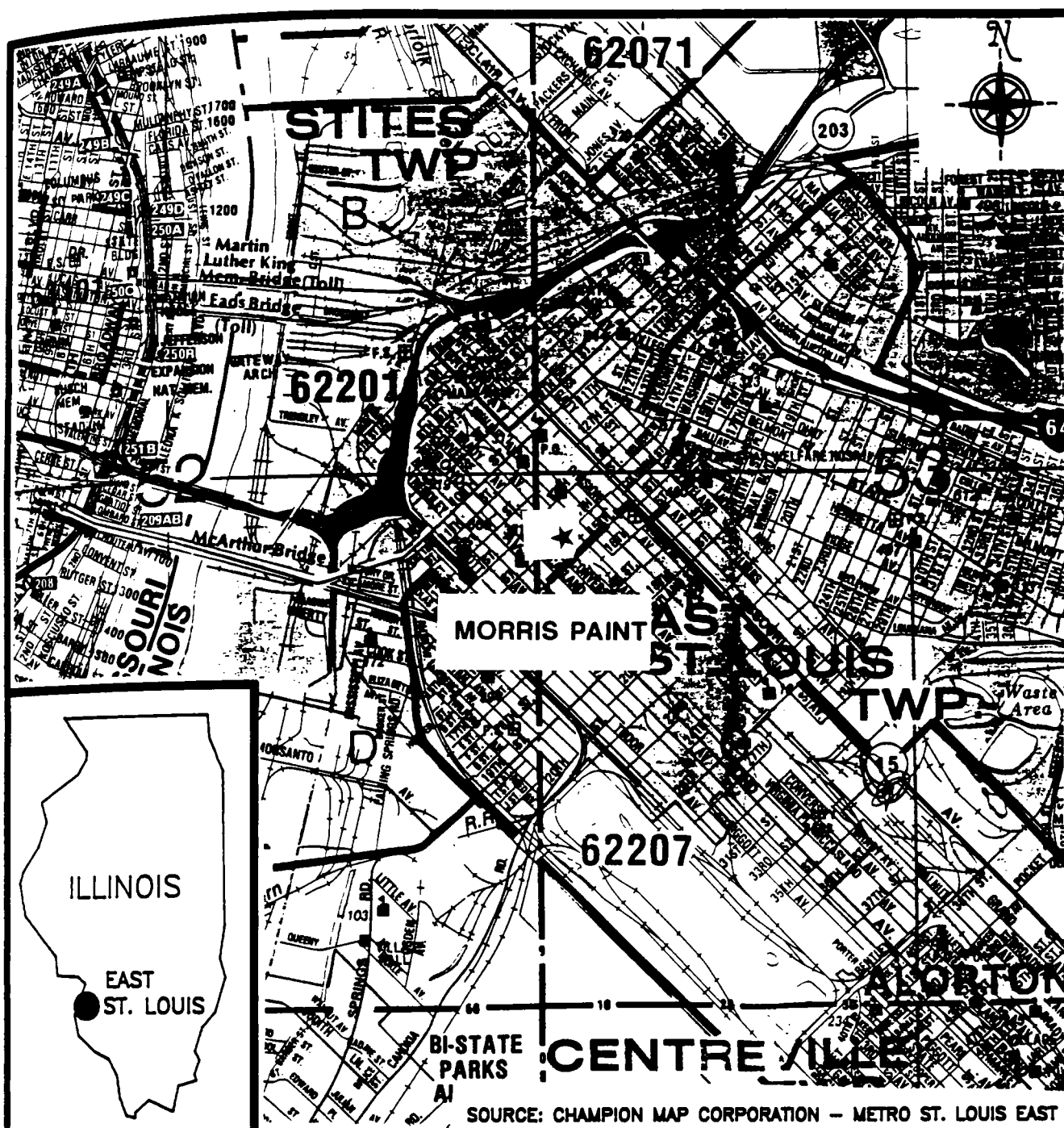


FIGURE 1

## SITE LOCATION MAP

MORRIS PAINT & VARNISH CO.

EAST ST. LOUIS, ILLINOIS

**SCALE: 1 INCH = APPROXIMATELY 0.5 MILES**

## REGION V TECHNICAL ASSISTANCE TEAM

DRAWN BY M. BALAZS	DATE 03-19-90	PCS # 2728
APPROVED BY A. POTJE	DATE 03-19-90	TDD # 5-9003-16B

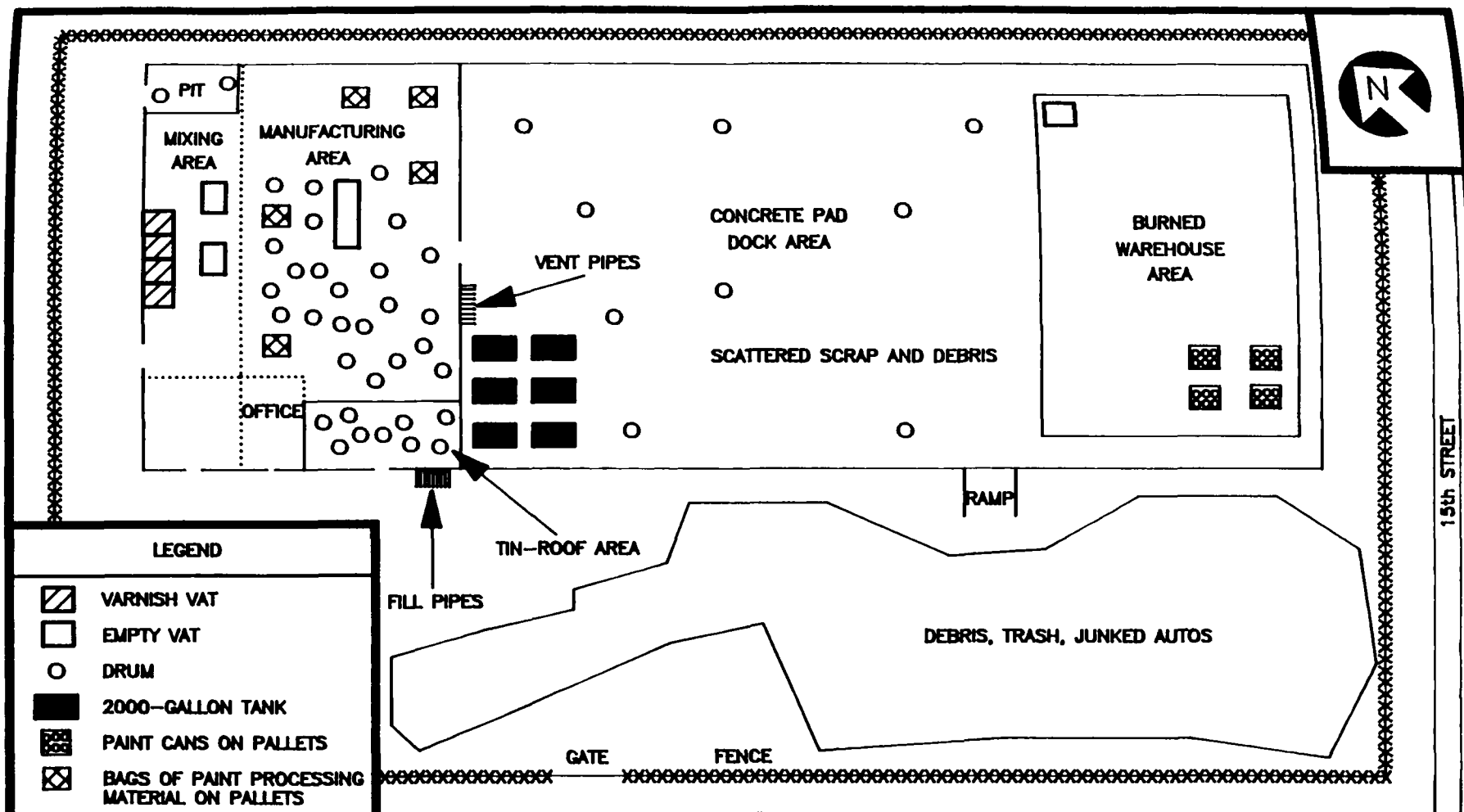


FIGURE 2

SITE MAP  
MORRIS PAINT & VARNISH CO.  
EAST ST. LOUIS, ILLINOIS

NOT TO SCALE

REGION V TECHNICAL ASSISTANCE TEAM

DRAWN BY M. BALAZS	DATE 4-12-90	PCS # 2728
APPROVED BY A. POTJE	DATE 4-12-90	TDD # 5-9003-168

two-phase removal action at the site. Phase I consisted of inventory, staging, sampling, and analyses of all drums on site. Phase I of the removal action was completed on May 10, 1988, at a cost of approximately \$250,000. Phase II, which consisted of disposal of 1,903 drums, began on May 15, 1989, and was completed on May 30, 1989, at a cost of approximately \$650,000.

During the IEPA removal action only the drums outside the building were removed. All drums inside the building, which were used for production of paint materials, were left on site.

In May, August, and November, 1989, the IEPA reinspected the site and found the facility to be in violation of Subsection 21(f) of the Illinois Environmental Protection Act. Through a series of Illinois circuit court orders, the facility was temporarily closed on January 4, 1990, and permanently closed on February 5, 1990 due to disposal of hazardous waste on site without a Resource Conservation and Recovery Act (RCRA) permit. Two fires occurred at the site on March 5, and March 9, 1990. The U.S. Environmental Protection Agency (U.S. EPA) was informed of the fires and resulting threats by the IEPA on March 9, 1990.

The U.S. EPA and the Technical Assistance Team (TAT) conducted an emergency site assessment (SA) of the Morris Paint site on March 13, 1990, (TDD # 5-9003-09). The solitary building on site was divided into three different sections (manufacturing area, dock area, and warehouse) based on paint manufacturing operations (Figure 2). TAT observed that drums and five-gallon pails were located in all three areas. Numerous open drums were documented to contain potentially flammable or reactive materials, and materials with a flashpoint of less than 140 °F, according to analytical results from TAT sampling.

### 1.3 Threat to Public Health and the Environment

Based on the TAT SA, conditions at the Morris Paint site posed a threat to human health and the environment, and warranted a removal action as set forth in Section 300.415(b)(2) of the National Contingency Plan (NCP). Specifically, the following conditions existed at the Morris Paint site:

- o Threat of fire and explosion;

Analytical results from drum samples indicated that the material had flashpoints ranging from 31°F to 215°F. If these substances were exposed to an ignition source, an explosion or fire could have occurred. Fires which occurred on March 5, and March 9, 1990, further exemplified this threat.

- o Actual or potential exposure to hazardous substances or

pollutants or contaminants by nearby populations, animals, or food chain;

Due to the proximity of industrial facilities, residences, and a school, the potential for human exposure to hazardous substances existed. Based on labels observed, the drums and cans were presumed to contain hazardous materials including solvents, resins, and paints. Ethylbenzene, xylene, and hexane were detected in concentrations greater than 1000 ppm in the drums and floor scrapings sampled. The threat of direct contact with these chemicals was increased by the lack of security at the site.

- o Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release;

Containers found on site were unmarked, dented, and deteriorating. The contents of several cans, vats, and tanks had leaked onto the floor and loading areas of the facility. Analysis of the floor scraping sample indicated the presence of ethylbenzene, toluene, and xylene.

- o Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.

Hazardous materials were stored in a building with a deteriorating roof. In the event of heavy rain, it was likely that the vats, open drums, and cans would fill and overflow their contents. Runoff from such an event could have transported contaminants off site.

#### 1.3.1 Natural Resource Damage

U.S. EPA did not conduct a formal environmental assessment, and to the best of the Agency's knowledge, the Natural Resource Trustee has not conducted a natural resource damage assessment.

#### 1.4 Attempts to Obtain a Response by Potential Responsible Parties

The site is owned by Mr. Sam Ferguson, who purchased the property and its contents from a bankruptcy court in 1979. Mr. Sam Ferguson manufactured paints and specialty chemicals for retail sale. Mr. Larry Ferguson appears to have been a co-operator of Morris Paint and Varnish.

On March 15, 1990, U.S. EPA contacted Mr. Larry Ferguson and Mr. Sam Ferguson by phone and offered them the opportunity to conduct the cleanup. The Fergusons claimed not to have any funds, and gave the U.S. EPA the authority to conduct the removal action. No other responsible parties have been identified.

### 1.5 Response Actions Taken

An action memorandum for \$674,000 was approved by the Acting Division Director for the Waste Management Division on March 29, 1990. Prior to this approval the removal action operated under three verbal authorizations of \$50,000 each by Robert Bowden, U.S. EPA Branch Chief, Emergency and Enforcement Response Branch, Region V and Norman Niedergang, Acting Associate Division Director, Office of Superfund. On March 29, 1990 the ERCS delivery order was increased from \$150,000 as verbally authorized to \$455,000 as outlined in the March 29, 1990 action memorandum. The U.S. EPA commenced the removal action at the Morris Paint site on March 16, 1990. The removal action basically included the dismantling of a fire damaged building, removal of underground storage tanks, and management of paint/solvent liquids, paint solids, wastewater, empty tanks, drums, cans, and steel scrap.

The removal action was coordinated by the Emergency Response Clean-up Services (ERCS) contractor PEI Associates of Cincinnati, Ohio. The removal action was performed by OHM Corporation (OHM) of Findlay, Ohio, as a subcontractor PEI Associates. OHM initially mobilized a response manager, a foreman, two equipment operators, six cleanup technicians, and a project control technician. Equipment mobilized included a trackhoe with bucket/shears/drum grapppler, a front end loader, a Bobcat, a can shredder, a car, a passenger van, a generator, a decontamination trailer, and an office trailer. Site security was maintained during all non-working hours throughout the removal action.

#### 1.5.1 Site Safety/Contractor meeting

On March 16, 1990, On-Scene Coordinator (OSC) Ken Theisen, TAT and representatives from OHM attended an on-site meeting to arrange for subcontracted services, and to review the site safety plan. Following this meeting work began on March 17, 1990. The guard service that was employed by IEPA after the fire on March 9, 1990, was retained to patrol the site during non-working hours, weekends, and demobilization periods.

#### 1.5.2 Segregation of Hazardous and Non-Hazardous Materials

Non-hazardous debris and scrap metal from inside the building and from areas surrounding the building were separated from drums, tanks, vats, and cans containing hazardous materials. The drums, vats, and cans were staged in the dock area, and the scrap metal was disposed of at a local scrap yard.

#### 1.5.3 Compatibility Testing and Compositing of Waste Streams

The materials in the drums, tanks, cans, and vats were sampled by an OHM chemist. All drum samples were tested for compatibility by TAT. These materials were grouped into eight waste streams. One

waste stream consisted of solid materials, and another consisted of a highly caustic material. Samples of all but two of the above waste streams were sent to Envirodyne Engineers of St. Louis, Missouri for disposal analysis. Based on the analytical results and consultations with the disposal facility, five waste streams were bulked in a bulking chamber. The highly caustic material was neutralized and bulked with another waste stream (wastewater) in a concrete pit on-site. The solid materials were bulked with solid paint materials.

#### 1.5.4 Disposal of Waste

One hazardous liquid waste stream consisting of solvents and liquid paint materials was transported to OHM Resource Recovery in Morrow, Georgia for fuels blending. Solid paint materials were transported to CID Processing in Calumet City, Illinois for landfilling as hazardous waste. Crushed drums and empty paint cans were transported to Milam Landfill, in Madison, Illinois for landfilling as special waste. Non-hazardous scrap metal was transported to a local scrap yard and non-hazardous debris was transported to a local sanitary landfill. The wastewater was transported to the Metropolitan St. Louis Sewer District for treatment. Table 1 summarizes disposal information for hazardous and special wastes.

#### 1.5.5 Demobilization

On May 11, 1990 all crew and equipment were demobilized. The Bobcat, trackhoe, front end loader, and can shredder were decontaminated before demobilization. All on-site removal activities were completed on June 6, 1990.

#### 1.6 Community Relations

No formal community relations plan was developed for this site. The OSC provided weekly progress POLREPS to the City of East St. Louis through the East St. Louis ESDA Coordinator.

#### 1.7 Cost Summary

PEI was the prime ERCS contractor for the Morris Paint site. All on-site activities were subcontracted to OHM by PEI (Delivery Order # 7460-05-137). Site activities commenced on March 16, 1990, and were concluded on June 6, 1990. Table 2 summarizes daily expenditures for services provided by the cleanup contractor. As of June 22, 1990, total expenditures submitted by OHM totaled \$390,100. Table 3 is a Cost Summary Report prepared by PEI on 3/6/91 which provides a breakdown of the expenditures into the five major categories of labor, subsistence, equipment, materials, and subcontractor. The Cost Summary Report credited the project for \$4,523 and adjusted the project total to \$386,533. In addition to the ERCS contractor, costs were incurred by the TAT (TDD # 5-9003-

TABLE 1  
Disposal Summary  
Morris Paint  
East St. Louis, Illinois

Waste	Quantity	Disposal Facility	Date Shipped	Transporter
Special Waste	20 cu. yd	Milam landfill	4/19/90	Midwest Waste
Special Waste	20 cu. yd	Milam landfill	4/19/90	Midwest Waste
Special Waste	20 cu. yd	Milam landfill	4/20/90	Midwest Waste
Special Waste	20 cu. yd	Milam landfill	4/20/90	Midwest Waste
Special Waste	20 cu. yd	Milam landfill	4/20/90	Midwest Waste
R.Q. Haz Waste Solid	20 cu. yd	CID	5/02/90	Beelman
R.Q. Haz Waste Solid	20 cu. yd	CID	5/02/90	Beelman
Q. Haz Waste Solid	20 cu. yd	CID	5/02/90	Beelman
R.Q. Haz Waste Solid	20 cu. yd	CID	5/02/90	Beelman
R.Q. Haz Waste Solid	20 cu. yd	CID	5/02/90	Beelman
Special Waste	20 cu. yd	Milam landfill	5/02/90	Midwest Waste
Special Waste	20 cu. yd	Milam landfill	5/02/90	Midwest Waste
Special Waste	20 cu. yd	Milam landfill	5/02/90	Midwest Waste
Special Waste	20 cu. yd	Milam landfill	5/04/90	Midwest Waste
R.Q. Haz Waste Solid	20 cu. yd	CID	5/04/90	Beelman
R.Q. Haz Waste Solid	20 cu. yd	CID	5/08/90	Beelman
R.Q. Haz Waste Solid	20 cu. yd	CID	5/08/90	Beelman
R.Q. Haz Waste Solid	20 cu. yd	CID	5/08/90	Beelman
R.Q. Waste Flammable Liquid	4000 gal	OHM Resource Recovery	5/08/90	Delta Env.
R.Q. Waste Flammable Liquid	4500 gal	OHM Resource Recovery	5/08/90	Delta Env.
Special Waste	20 cu. yd	Milam landfill	5/09/90	Midwest Waste
Special Waste	20 cu. yd	Milam landfill	5/09/90	Midwest Waste
Q. Haz Waste Solid	20 cu. yd	CID	5/09/90	Beelman
R.Q. Haz Waste Solid	20 cu. yd	CID	5/09/90	Beelman
R.Q. Haz Waste Solid	20 cu. yd	CID	5/09/90	Beelman
Special Waste	20 cu. yd	Milam landfill	5/10/90	Midwest Waste
Special Waste	1300 gal	Metro St. Louis sewer district	6/06/90	Able



**TABLE 2**  
**PEI COST SUMMARY REPORT (3/6/91)**  
**Summary of Daily ERCS Sub-contractor Expenditures\***  
**Morris Paint, East St. Louis, Illinois**  
**March 16 - June 22, 1990**

Date	Daily Total	Date	Daily Total
03/16/90	7464	04/14/90	0
03/17/90	27456	04/15/90	0
03/18/90	9695	04/16/90	6538
03/19/90	7880	04/17/90	3249
03/20/90	7282	04/18/90	4712
03/21/90	10890	04/19/90	4161
03/22/90	6424	04/20/90	20723
03/23/90	13069	04/21/90	25
03/24/90	3400	04/22/90	23
03/25/90	2162	04/23/90	49
03/26/90	2447	04/24/90	49
03/27/90	7496	04/25/90	49
03/28/90	8957	04/26/90	49
03/29/90	7567	04/27/90	0
03/30/90	6054	04/28/90	0
03/31/90	1353	04/29/90	0
04/01/90	881	04/30/90	2095
04/02/90	6158	05/01/90	4224
04/03/90	9724	05/02/90	3476
04/04/90	5799	05/03/90	2848
04/05/90	5741	05/04/90	3475
04/06/90	4318	05/05/90	151
04/07/90	795	05/06/90	385
04/08/90	890	05/07/90	4094
04/09/90	7396	05/08/90	4064
04/10/90	4253	05/09/90	4803
04/11/90	2959	05/10/90	3247
04/12/90	1788	05/11/90	28187
04/13/90	0	05/12/90	753
05/21/90	13594	05/29/90	24957
06/22/90	62189	TOTAL	390,100

\*Based on estimated costs from U.S. EPA Incident Obligation Log (1900-55).  
 PEI prepared the 1900-55 for 6/22/90 to address awaiting bills for 5/30/90  
 to 6/22/90.

**TABLE 3**  
Summary of ERCS Contractor Expenditures By Service Category \*  
Morris Paint, East St. Louis, Illinois  
March 16, 1990-June 22, 1990

<u>Service</u>	<u>Amount</u>
Labor	132,514.15
Equipment	50,188.91
Material	17,716.23
Subcontractor	186,113.33
	-----
Total	386,532.62

\* Based on PEI Cost Summary Report dated 3/5/91

\* Any indication of specific costs incurred at the site is only an approximation, subject to audit and final definitization by the U.S. EPA. The OSC Report is not meant to be a final reconciliation of the costs associated with a particular site.

16) and U.S. EPA. A total removal costs summary is presented in Table 4.

## 2.0 EFFECTIVENESS OF REMOVAL ACTION

The removal action at the Morris Paint site mitigated immediate threats to human health and the environment posed by the waste material stored at the site. All drums, tanks, and vats on site were removed and disposed of at off-site facilities. All the contents within these containers including flammable organic liquids were disposed of at approved treatment/disposal facilities, in accordance with the CERCLA Off-Site Policy.

### 2.1 Potentially Responsible Parties

Refer to Section 1.4.

### 2.2 State and Local Agencies

The IEPA provided pertinent site background information. An IEPA official periodically visited the site for updates on the progress of the removal action.

### 2.3 Federal Agencies

The U.S. EPA provided all monetary resources for the removal.

## 3.0 DIFFICULTIES ENCOUNTERED

Analytical results from Envirodyne contracted for a one week turnaround time were delayed by more than a week, resulting in a delay in disposal approval. Additional standby costs were incurred because of this delay.

After OHM Resource Recovery in Morrow, Georgia received a load of waste flammable liquid, the OHM facility claimed that the waste contained a higher percentage of water than the agreed upon 12% when disposal arrangements were initially made. Therefore OHM Resource Recovery increased the cost for fuels blending of this waste stream.

Disposal of paint solids at Peoria Disposal Landfill (PDL) was delayed and subsequently denied because of liability provisions within PDL's Disposal Contract that were unacceptable to PEI and U.S. EPA.

## 4.0 RECOMMENDATIONS

The Morris Paint And Varnish Site is a "Classic Emergency Response Action" where a U.S. EPA OSC was called on to immediately respond to a major fire at an industrial plant. In this incident, the OSC

TABLE 4

Summary of Total Removal Costs \*  
Morris Paint  
East St. Louis, Illinois  
March 16, 1990-June 22, 1990

<u>Organization</u>	<u>Amount</u>
ERCS Contractor (1)	\$386,533
U.S. EPA (2)	44,031
TAT (3)	<u>38,293</u>
Total	\$468,857

\* Any indication of specific costs incurred at the site is only an approximation, subject to audit and final definitization by the U.S. EPA. The OSC Report is not meant to be a final reconciliation of the costs associated with a particular site.

(1) Based on costs from PEI's Cost Summary Report dated 3/6/91

(2) Based on costs from U.S. EPA's Itemized Cost Summary Report dated 5/7/91

(3) Based on costs from U.S. EPA's Final Acknowledgment of completion Report for TDD# 5-9003-16 dated 11/28/91 action at Morris Paint. Under direct guidance of the OSC, the removal effectively removed existing environmental and public health threats posed by conditions at the site.

that initially responded, Ken Theisen, determined that the threat of additional fires at the site required the immediate initiation of security services and a removal action. Ken initiated the removal action under a \$50,000 verbal authorization, stabilized conditions at the site and transferred responsibility for the removal action to another OSC.

The use of the verbal authorization allowed Ken to take immediate action to prevent further fires at this uncontrolled site. The transfer of site responsibilities to another OSC allowed Ken a much needed rest and allowed Ken to return to his other removal action sites. The successful actions taken at this site by Ken further support the use of verbal authority to initiate immediate emergency response actions by U.S. EPA that could not be initiated by local or state response agencies.

**ATTACHMENT A**

**ACTIVITY LOG**

EAST ST. LOUIS, ILLINOIS

**MARCH**

16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
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## METAL SCRAP AND DEBRIS

## PAINT SOLIDS

## WASTEWATER

**ACTIVITY LOG**  
**MORRIS PAINT**  
**EAST ST. LOUIS, ILLINOIS**

### ACTIVITY

APRIL

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30

## MOBILIZE/DEMOBOLIZE

**CLEAR DEBRIS**

## DRUM SAMPLING

## COMPATIBILITY TESTING

## EXCAVATING UNDERGROUND TANKS

## SAMPLE ANALYSIS

## BULKING OF LIQUIDS

**CRUSH/SHRED/CUT DRUMS, CANS, AND TANKS**

## DISPOSAL OF

## METAL SCRAP AND DEBRIS

**CRUSHED DRUMS, CUT UP TANKS**

## PAINT SOLIDS

## PAINT LIQUIDS AND SOLVENTS

## WASTEWATER



**ACTIVITY LOG**  
**MORRIS PAINT**  
**EAST ST. LOUIS, ILLINOIS**

### ACTIVITY

MAY

**JUNE**

**1    2    3    4    5    6    7    8    9    10    11**

6

## MOBILIZE/DEMOBOLIZE

<->

**CLEAR DEBRIS**

←-----→

◀-----▶

## DRUM SAMPLING

## COMPATIBILITY TESTING

## EXCAVATING UNDERGROUND TANKS

## SAMPLE ANALYSIS

## BULKING OF LIQUIDS

**<----->**

**CRUSH/SHRED/CUT DRUMS, CANS, AND TANKS**

**<----->**

<- - - - ->

## DISPOSAL OF

**METAL SCRAP AND DEBRIS**

**<----->**

◀-----▶

**CRUSHED DRUMS, CUT UP TANKS**

**<----->**

**<----->**

## PAINT SOLIDS

←-----→

**<----->**

## PAINT LIQUIDS AND SOLVENTS

<->

## WASTEWATER

**<->**

ATTACHMENT B

PHOTOGRAPHS



PHOTO: 1  
 SITE NAME: MORRIS PAINT, EAST ST. LOUIS, ILLINOIS  
 DESCRIPTION: OHM CREW MOBILIZING SUPPLIES  
 DATE/TIME: 03-16-90/1000  
 PHOTOGRAPHER: N. KUMARANAYAGAM *NK*  
 FILM: 35MM, ISO 200



PHOTO: 2  
 SITE NAME: MORRIS PAINT, EAST ST. LOUIS, ILLINOIS  
 DESCRIPTION: FRONT END LOADER MOVING METAL SCRAP  
 AND DEBRIS ON SOUTHERN CORNER OF SITE  
 DATE/TIME: 03-17-90/1400  
 PHOTOGRAPHER: N. KUMARANAYAGAM *NK*  
 FILM: 35MM, ISO 200

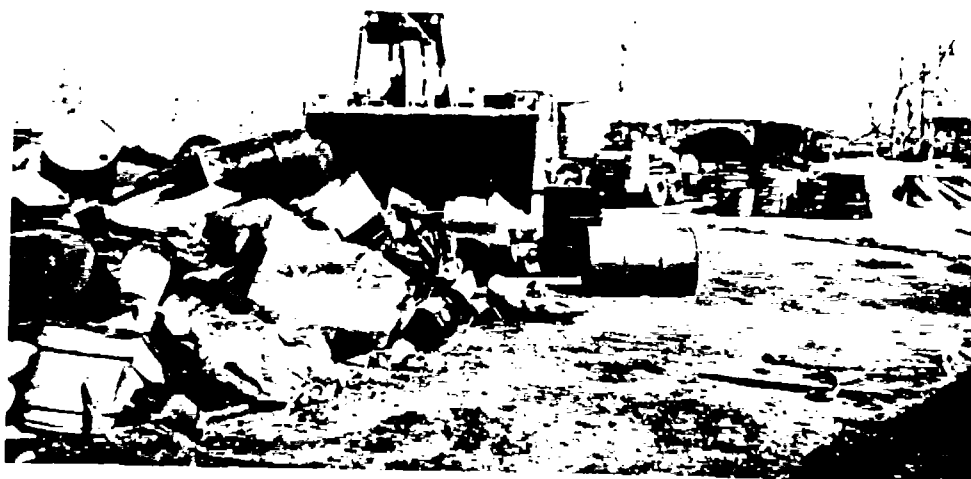


PHOTO: 3  
 SITE NAME: MORRIS PAINT, EAST ST. LOUIS, ILLINOIS  
 DESCRIPTION: FRONT END LOADER MOVING EMPTY DRUMS  
 AND DEBRIS ON DOCK AREA  
 DATE/TIME: 03-17-90/1600  
 PHOTOGRAPHER: N. KUMARANAYAGAM *NK*  
 FILM: 35MM, ISO 200



PHOTO: 4  
 SITE NAME: MORRIS PAINT, EAST ST. LOUIS, ILLINOIS  
 DESCRIPTION: DOCK AREA BEFORE REMOVAL ACTION COMMENCED  
 DATE/TIME: 03-17-90-0900  
 PHOTOGRAPHER: N. KUMARANAYAGAM *NK*  
 FILM: 35MM, ISO 200



PHOTO: 5  
 SITE NAME: MORRIS PAINT, EAST ST. LOUIS, ILLINOIS  
 DESCRIPTION: SOUTHERN CORNER OF SITE BEFORE REMOVAL ACTION  
 COMMENCED  
 DATE/TIME: 03-17-90/0845  
 PHOTOGRAPHER: N. KUMARANAYAGAM *NK*  
 FILM: 35MM, ISO 200



PHOTO: 6  
 SITE NAME: MORRIS PAINT, EAST ST. LOUIS, ILLINOIS  
 DESCRIPTION: DOCK AREA LOOKING SOUTHWEST BEFORE REMOVAL  
 ACTION COMMENCED  
 DATE/TIME: 03-17-90/0835  
 PHOTOGRAPHER: N. KUMARANAYAGAM *NK*  
 FILM: 35MM, ISO 200



PHOTO: 7  
 SITE NAME: MORRIS PAINT, EAST ST. LOUIS, ILLINOIS  
 DESCRIPTION: OHM CREW CONSTRUCTING DOORS TO BE USED FOR  
 SECURING MANUFACTURING BUILDING  
 DATE/TIME: 03-18-90/1500  
 PHOTOGRAPHER: N. KUMARANAYAGAM *NK*  
 FILM: 35MM, ISO 200

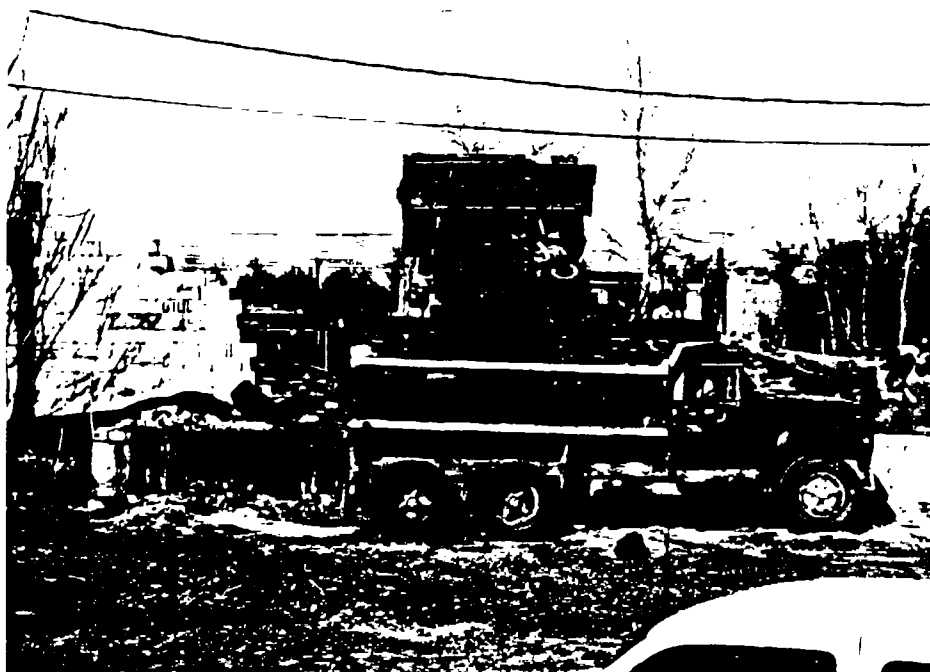


PHOTO: 8  
 SITE NAME: MORRIS PAINT, EAST ST. LOUIS, ILLINOIS  
 DESCRIPTION: FRONT END LOADER LOADING METAL SCRAP ON TO  
 GIBSON'S TRUCK  
 DATE/TIME: 03-18-90/1130  
 PHOTOGRAPHER: N. KUMARANAYAGAM *NK*  
 FILM: 35MM, ISO 200



PHOTO: 9  
 SITE NAME: MORRIS PAINT, EAST ST. LOUIS, ILLINOIS  
 DESCRIPTION: BURNED WAREHOUSE LOOKING SOUTHWEST BEFORE  
 REMOVAL ACTION COMMENCED  
 DATE/TIME: 03-17-90/0930  
 PHOTOGRAPHER: N. KUMARANAYAGAM *NK*  
 FILM: 35MM, ISO 200



PHOTO: 10  
 SITE NAME: MORRIS PAINT, EAST ST. LOUIS, ILLINOIS  
 DESCRIPTION: TRACKHOE WITH SHEARS LOADING METAL SCRAP ON TO  
 GIBSON'S TRUCK  
 DATE/TIME: 03-28-90/1000  
 PHOTOGRAPHER: N. KUMARANAYAGAM *NK*  
 FILM: 35MM, ISO 200



PHOTO: 11  
 SITE NAME: MORRIS PAINT, EAST ST. LOUIS, ILLINOIS  
 DESCRIPTION: TRACKHOE WITH SHEARS PULLING DOWN REMNANTS OF  
 WAREHOUSE BUILDING  
 DATE/TIME: 03-26-90/1100  
 PHOTOGRAPHER: N. KUMARANAYAGAM *N.K.*  
 FILM: 35MM, ISO 200



PHOTO: 12  
 SITE NAME: MORRIS PAINT, EAST ST. LOUIS, ILLINOIS  
 DESCRIPTION: TRACKHOE WITH SHEARS PULLING DOWN REMNANTS OF  
 WAREHOUSE BUILDING  
 DATE/TIME: 03-26-90/1030  
 PHOTOGRAPHER: N. KUMARANAYAGAM *N.K.*  
 FILM: 35MM, ISO 200





PHOTO: 13  
 SITE NAME: MORRIS PAINT, EAST ST. LOUIS, ILLINOIS  
 DESCRIPTION: ROLLOFF BOX CONTAINING CRUSHED DRUMS AND TANKS  
 DATE/TIME: 03-25-90/9010  
 PHOTOGRAPHER: N. KUMARANAYAGAM *NK*  
 FILM: 35MM, ISO 200



PHOTO: 14  
 SITE NAME: MORRIS PAINT, EAST ST. LOUIS, ILLINOIS  
 DESCRIPTION: MIDWEST WASTE DELIVERING EMPTY ROLLOFF BOX  
 DATE/TIME: 03-22-90/1230  
 PHOTOGRAPHER: N. KUMARANAYAGAM *NK*  
 FILM: 35MM, ISO 200

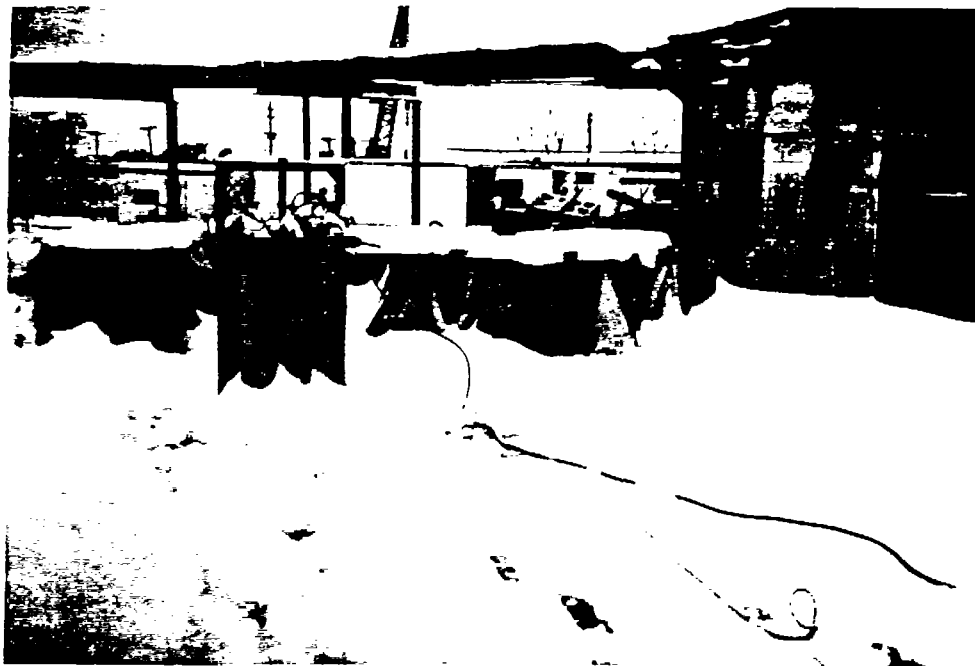


PHOTO: 15  
 SITE NAME: MORRIS PAINT, EAST ST. LOUIS, ILLINOIS  
 DESCRIPTION: SITE AFTER SNOWSTORM, DRUMS HAVE BEEN COVERED  
 WITH VISQUEEN  
 DATE/TIME: 03-24-90/1000  
 PHOTOGRAPHER: N. KUMARANAYAGAM *NK*  
 FILM: 35MM, ISO 200

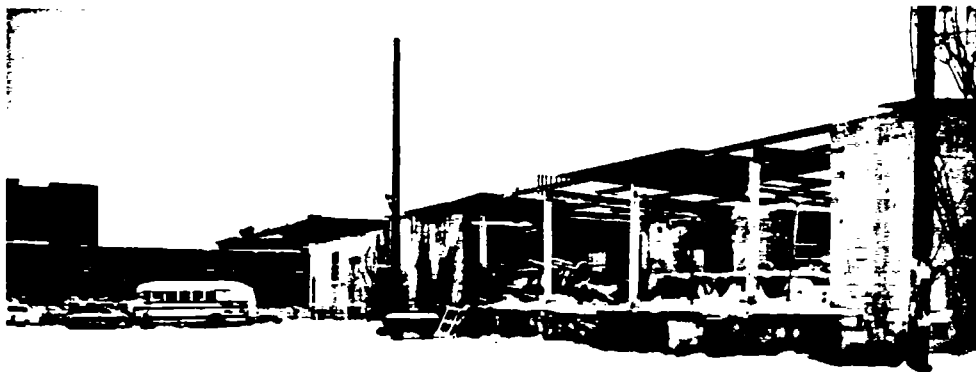


PHOTO: 16  
 SITE NAME: MORRIS PAINT, EAST ST. LOUIS, ILLINOIS  
 DESCRIPTION: SITE AFTER SNOWSTORM  
 DATE/TIME: 03-24-90/1030  
 PHOTOGRAPHER: N. KUMARANAYAGAM *NK*  
 FILM: 35MM, ISO 200



PHOTO: 17  
 SITE NAME: MORRIS PAINT, EAST ST. LOUIS, ILLINOIS  
 DESCRIPTION: TRACKHOE WITH SHEARS CUTTING METAL ROOFING  
 SECTIONS  
 DATE/TIME: 03-26-90/0705  
 PHOTOGRAPHER: N. KUMARANAYAGAM *N.K.*  
 FILM: 35MM, ISO 200



PHOTO: 18  
 SITE NAME: MORRIS PAINT, EAST ST. LOUIS, ILLINOIS  
 DESCRIPTION: FRONT END LOADER UNLOADING PAINT CANS INTO CAN  
 SHREDDER  
 DATE/TIME: 03-29-90/0730  
 PHOTOGRAPHER: N. KUMARANAYAGAM *N.K.*  
 FILM: 35MM, ISO 200



PHOTO: 19  
 SITE NAME: MORRIS PAINT, EAST ST. LOUIS, ILLINOIS  
 DESCRIPTION: SHREDDED CANS AND PAINT SOLIDS STAGED ON DOCK  
 AREA  
 DATE/TIME: 03-30-90/1120  
 PHOTOGRAPHER: N. KUMARANAYAGAM *NK*  
 FILM: 35MM, ISO 200



PHOTO: 20  
 SITE NAME: MORRIS PAINT, EAST ST. LOUIS, ILLINOIS  
 DESCRIPTION: TRACKHOE WITH SHEARS CUTTING UP TANKS  
 DATE/TIME: 04-05-90/8045  
 PHOTOGRAPHER: N. KUMARANAYAGAM *NK*  
 FILM: 35MM, ISO 200

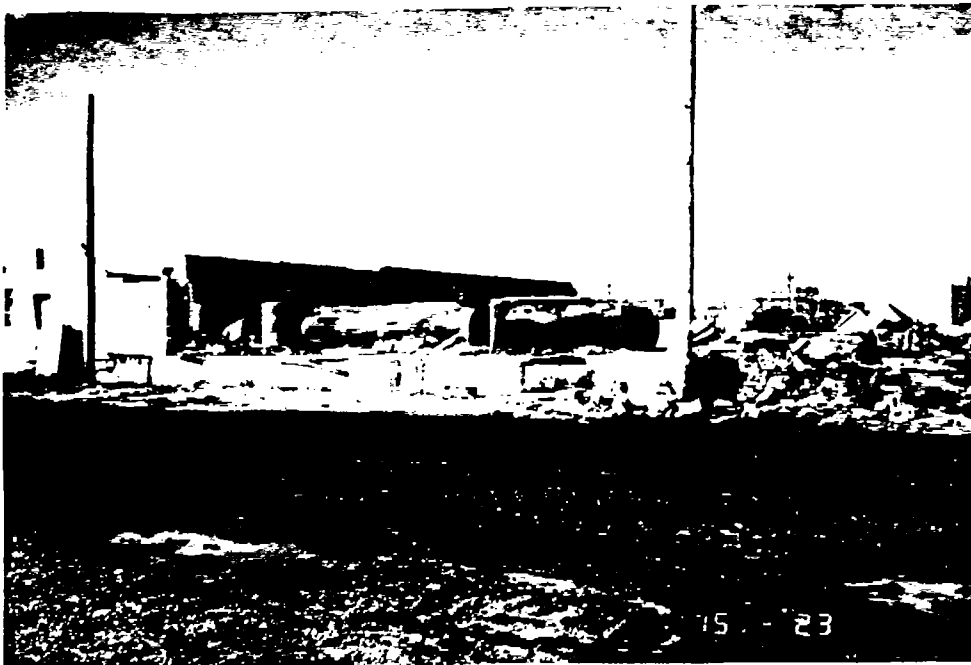


PHOTO: 21  
 SITE NAME: MORRIS PAINT, EAST ST. LOUIS, ILLINOIS  
 DESCRIPTION: EXCAVATED UNDERGROUND TANKS  
 DATE/TIME: 04-06-90/1523  
 PHOTOGRAPHER: N. KUMARANAYAGAM *NK*  
 FILM: 35MM, ISO 200



PHOTO: 22  
 SITE NAME: MORRIS PAINT, EAST ST. LOUIS, ILLINOIS  
 DESCRIPTION: FRONT END LOADER LOADING SHREDDED CANS AND PAINT  
 SOLIDS INTO BEELMAN TRUCK.  
 DATE/TIME: 05-02-90/1300  
 PHOTOGRAPHER: N. KUMARANAYAGAM *NK*  
 FILM: 35MM, ISO 200

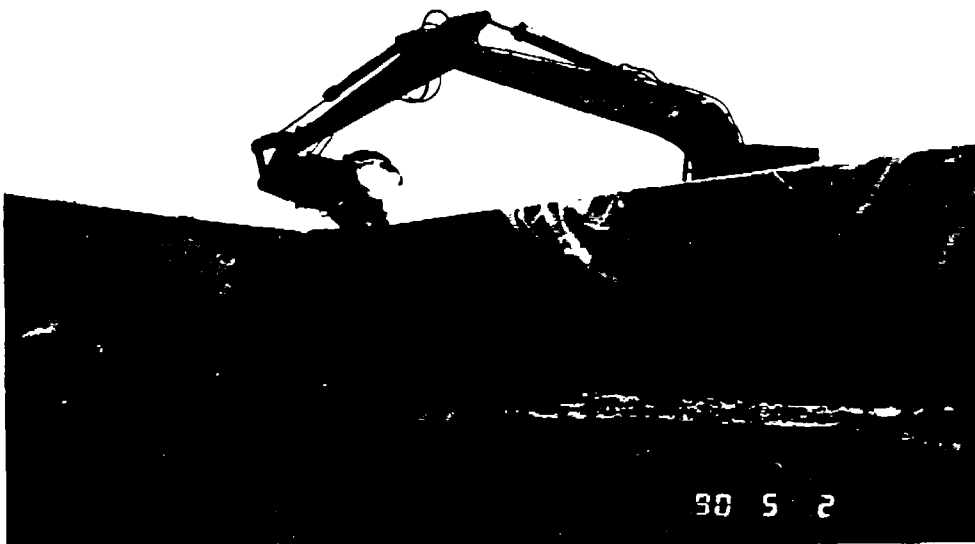


PHOTO: 23  
 SITE NAME: MORRIS PAINT, EAST ST. LOUIS, ILLINOIS  
 DESCRIPTION: TRACKHOE WITH DRUM GRAPPLER EMPTYING DRUM  
 CONTENTS INTO BULKING CHAMBER.  
 DATE/TIME: 05-02-90/1430  
 PHOTOGRAPHER: N. KUMARANAYAGAM *NK*  
 FILM: 35MM, ISO 200

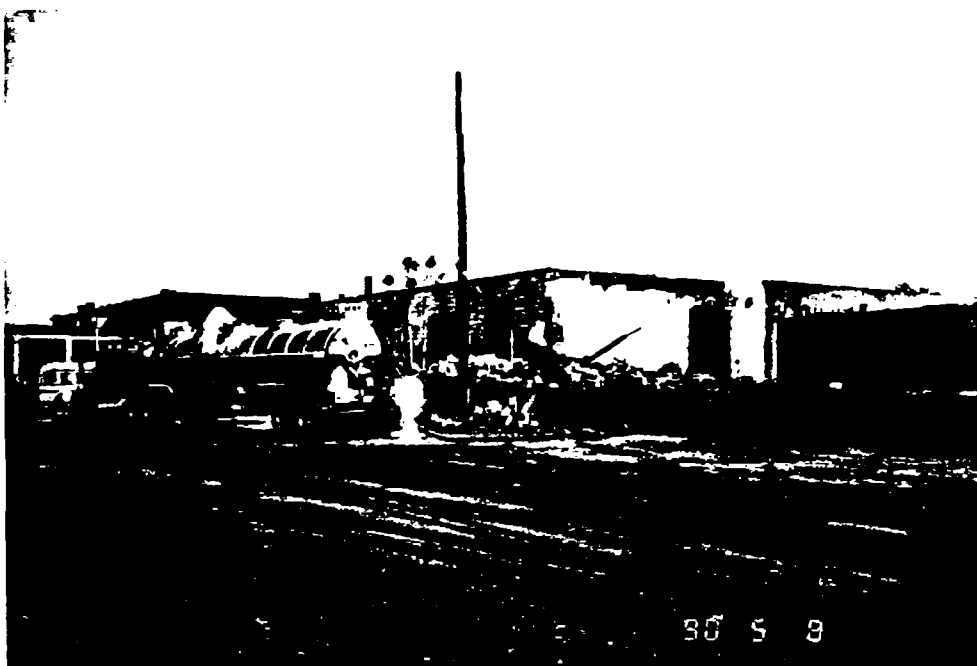


PHOTO: 24  
 SITE NAME: MORRIS PAINT, EAST ST. LOUIS, ILLINOIS  
 DESCRIPTION: CONTENTS OF BULKING CHAMBER BEING PUMPED INTO  
 VACUUM TANKER TRUCK  
 DATE/TIME: 05-08-90/1000  
 PHOTOGRAPHER: N. KUMARANAYAGAM *NK*  
 FILM: 35MM, ISO 200



PHOTO: 25  
 SITE NAME: MORRIS PAINT, EAST ST. LOUIS, ILLINOIS  
 DESCRIPTION: DOCK AREA AFTER REMOVAL OF ALL HAZARDOUS  
 MATERIALS LOOKING WEST  
 DATE/TIME: 05-10-90/1120  
 PHOTOGRAPHER: N. KUMARANAYAGAM *NK*  
 FILM: 35MM, ISO 200



PHOTO: 26  
 SITE NAME: MORRIS PAINT, EAST ST. LOUIS, ILLINOIS  
 DESCRIPTION: DOCK AREA AFTER REMOVAL OF ALL HAZARDOUS  
 MATERIALS LOOKING NORTHWEST  
 DATE/TIME: 05-10-90/1115  
 PHOTOGRAPHER: N. KUMARANAYAGAM *NK*  
 FILM: 35MM, ISO 200



PHOTO: 27  
 SITE NAME: MORRIS PAINT, EAST ST. LOUIS, ILLINOIS  
 DESCRIPTION: DOCK AREA AND FORMER WAREHOUSE AREA AFTER  
 REMOVAL OF ALL HAZARDOUS MATERIALS LOOKING  
 SOUTHEAST  
 DATE/TIME: 05-11-90/1345  
 PHOTOGRAPHER: N. KUMARANAYAGAM *N.K.*  
 FILM: 35MM, ISO 200



PHOTO: 28  
 SITE NAME: MORRIS PAINT, EAST ST. LOUIS, ILLINOIS  
 DESCRIPTION: FORMER WAREHOUSE AREA AFTER REMOVAL OF ALL  
 HAZARDOUS MATERIALS LOOKING EAST  
 DATE/TIME: 05-11-90/1400  
 PHOTOGRAPHER: N. KUMARANAYAGAM *N.K.*  
 FILM: 35MM, ISO 200



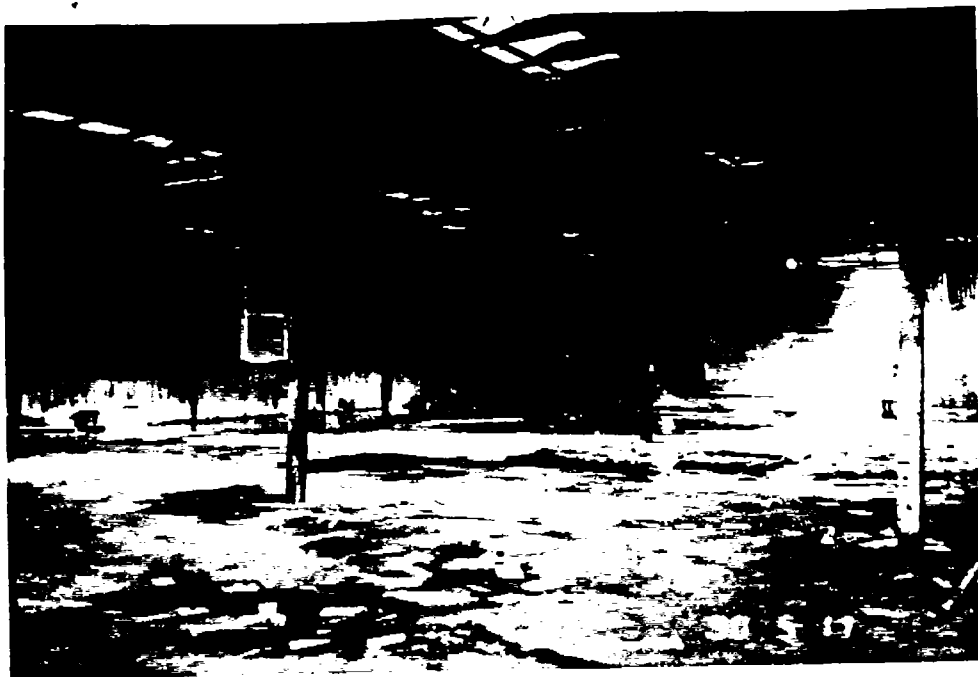


PHOTO: 29

SITE NAME: MORRIS PAINT, EAST ST. LOUIS, ILLINOIS

DESCRIPTION: MANUFACTURING AREA AFTER REMOVAL OF ALL  
HAZARDOUS MATERIALS LOOKING EAST

DATE/TIME: 05-11-90/1410

PHOTOGRAPHER: N. KUMARANAYAGAM *NK*

FILM: 35MM, ISO 200